



Southern  
Illinois University  
Carbondale

February 6, 2006

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Ex Parte Presentation  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Southern Illinois University Carbondale (SIUC) is submitting this letter to express our concern about the number-based contribution mechanism approach currently being proposed by the Commission. We feel this particular approach is certain to have a great impact on colleges and universities across the country and a detrimental effect on our university in particular. We feel better, viable alternative approaches are available for the Commission's consideration.

In regard to the number-based contribution mechanism approach, we have calculated annual federal universal service obligation would increase from \$12,000/year to over \$200,000/year if this approach were adopted, assuming that the per-number fee was \$1.00.

SIUC, as many state universities in Illinois, simply does not have resources available to absorb this sizable increase due to the significant decline in both state funding and in long distance revenue over the past several years. If the Commission approves the number-based contribution mechanism approach, SIUC Telecommunications Services would be forced to make some very difficult decisions regarding which services we can continue to offer to our faculty, staff, and students. Ironically, this number-based reform comes at a time when SIUC is working very diligently to obtain support from our upper administration to approve a monthly telephone line rate increase across our campus so that we will not have to eliminate any of our current services in light of our declining revenues as referenced above.

However, if the number-based contribution mechanism approach becomes reality; most likely the following services will be targeted for severe modification on our campus:

- *Numbers assigned to multiple locations.* — This would severely cripple a large number of faculty who has come to depend on voice availability in their office, lab, and classrooms for access to students and research. It would also severely limit vocal top administrators who maintain multiple offices across campus for conducting university business.
- *Number resources over semester breaks and number reserves earmarked for future campus priorities.* — SIUC would be forced to greatly modify the way in which numbering blocks are maintained year-round, which would hugely impact social and academic life within our entire campus community, as well as open the door for a host of potential public safety risks.

We highly encourage the Commission to realize that enterprise customers include not only Fortune 500 companies, but also many not-for-profit organizations, including local and state governments, charitable organizations, and medical institutions. Many of these entities, much like colleges and universities such as us, do not have the resources available to internalize significant increases in regulatory fees.

The modern universal service program created by Congress in 1996 continues to require universal service contributions to be equitable. However, based on the current record in this proceeding, it remains unclear if a pure number-based contribution mechanism approach could fully satisfy this basic requirement of Section 254.

SIUC has always fully supported the goals of universal service, and praise the Commission for their efforts to extend telecommunications services to all Americans. However, we believe it is imperative for the Commission to address universal service distribution issues by controlling future fund growth and limiting any waste within the program.

In summary, although SIUC supports the Commission's efforts in respect to a number-based approach, we feel a hybrid approach or an approach through number equivalencies for enterprise customers would be superior alternatives and also present less of a fiscal challenge to those that most certainly would be impacted by this reform.

At this time, we highly recommend that no reform proposals be formally adopted by the Commission until all approaches are further studied to learn of the total impact and are well understood by all parties involved.

Thank your for your consideration of this important matter.

Sincerely,

David R. Bouhl, Deputy Director  
Information Technology – Telecommunications Services

c: Donald G. Olson, Director  
Information Technology